

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: William Warren Goetz,	:	Chapter 13
	:	
Debtor.:	:	
	:	NO. 17-13762 ELF
Wells Fargo Bank, National Association	:	
Movant,	:	11 U.S.C. §362
vs.	:	
William Warren Goetz,	:	
	:	
William C. Miller, Esq.	:	11 U.S.C. Sections 362 and 1301
	:	
Respondents	:	

**ORDER**

AND NOW, this            day of            , 2018, upon consideration of Debtor William Goetz's Opposition to Wells Fargo's N.A.'s Motion for Relief From Automatic Stay and any response thereto, it is hereby:

ORDERED and DECREED, that the Motion for Relief from Automatic Stay is DENIED.

By the Court: \_\_\_\_\_

United States Bankruptcy Judge

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: William Warren Goetz,	:	Chapter 13
	:	
Debtor.:	:	
	:	NO. 17-13762 ELF
Wells Fargo Bank, National Association	:	
Movant,	:	11 U.S.C. §362
vs.	:	
William Warren Goetz,	:	
	:	
William C. Miller, Esq.	:	11 U.S.C. Sections 362 and 1301
	:	
Respondents	:	

**DEBTOR'S ANSWER IN OPPOSITION TO MOTION  
FOR RELIEF FROM AUTOMATIC STAY DOC # 62**

William Warren Goetz (“Debtor”), through counsel Paul A.R. Stewart, respectfully submits this Opposition to the Motion of Wells Fargo Bank’s (“Creditor” or “Movant”) for relief from the automatic stay filed on December 28, 2017, as follows:

- 1) Admitted.
- 2) Admitted only as stated not to validity of state court proceedings.
- 3) Admitted – but rescheduled to February 2018.
- 4) Denied as stated.
- 5) Denied as stated.
- 6) Denied.
- 7) No response required. Denied as stated
- 8) Denied.
- 9) Denied
- 10) Denied

11) Denied

12) Denied as stated but admit no equity in the property based on recorded liens and mortgages.

13) Denied

14) Denied

**WHEREFORE**, Debtor prays this Honorable Court DENY Movant's Motion for Relief  
From Automatic Stay.

Date: 01/15/18

Respectfully submitted,

/S/ Paul A.R. Stewart, Esquire

---

Legal Helm, LLC  
Paul A.R. Stewart, Esquire  
Attorney for Debtor-Respondent

The undersigned hereby certifies that a true and accurate copy of the foregoing Answer in Opposition to Motion for Relief from Stay # 62 was served on January 15, 2018, by means of the Court's CM/ECF system or via first class mail, postage prepaid, upon the following:

**Counsel for Movant**

Harry B. Reese, Esquire  
Powers, Kirn and Associates, LLC  
8 Neshaminy Interplex, Suite 215  
Trevose, PA 19053  
Phone: (215)-942-2090  
Attorneys for Movant/Applicant

**United States Trustee**

833 Chestnut Street, Suite 500  
Philadelphia, PA 19107

**William C. Miller, Esquire (Trustee)**

Chapter 13 Trustee  
111 S. Independence Mall, Suite 583  
Philadelphia, PA 19106  
and  
1234 MARKET STREET, SUITE 1813  
PHILADELPHIA, PA 19107

/S/ Paul A.R. Stewart, Esquire  
Legal Helm, LLC  
Paul A.R. Stewart, Esquire  
Attorney for Debtor  
333 East Lancaster Avenue  
Suite 140  
Wynnewood, Pennsylvania  
19096  
(610) 864-5600  
[pstewart@helmlegalservices.com](mailto:pstewart@helmlegalservices.com)